

From: Richard Bauer/R9/USEPA/US
Sent: 6/29/2012 5:00:08 PM
To: Cynthia Caporale/ESC/R3/USEPA/US@EPA
CC: John Bourbon/R2/USEPA/US@EPA; Rick McMillin/R6/USEPA/US@EPA; Brenda Bettencourt/R9/USEPA/US@EPA
Subject: Re: Question: Data Review Process used for R3 SF Project

I think what this is saying is that the internal review that we performed on the data generated here at the Region 9 Lab is sufficient to consider the data "validated", but that the internal review performed by TestAmerica and Pace is not sufficient and therefore their data required external review by an ESAT contractor in order to be considered "validated".

Subsequently a project level review was performed on all of the data. Why not call this the "validation" step in the process?

The Region 3 project team and data users can decide for themselves what data they consider "validated", but we would never say that of our own internally reviewed data. There is a lot of disagreement in the industry over what constitutes validation, but I think most people in the industry assume that it means it has gone through some form of review external to the laboratory.

In my opinion (for what it is worth) it is a big mistake for the Agency to treat data generated from one of the Regional labs any differently than data generated at another lab. There is nothing particularly magical about the internal reviews that we perform that makes the data any different from, say, TestAmericas data. I am, frankly, alarmed by the footnote in this technical summary and by the recent issue paper that Gary Bennett put out. I think this is a dangerous road to start heading down. But that's just my opinion.

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To: John Bourbon/R2/USEPA/US@EPA, Richard Bauer/R9/USEPA/US@EPA, Rick McMillin/R6/USEPA/US@EPA
Date: 06/29/2012 09:36 AM
Subject: Question: Data Review Process used for R3 SF Project

John, Rich and Rick,

I am assisting OSCs with writing a technical summary on the data review process used for the R3 Project, for which you provided support.

Here is a table from that document and of course we are trying to capture the regional lab-generated data and how it is reviewed internally and the levels of review completed by each lab is complimentary to data validation except for "external" review.

Does anyone have any issues with what is included in this table? This was reviewed by HQ Environmental Unit and HQ understands the process we used. The main audience for this document will be the public - however, it is being written for those individuals who have technical knowledge of methods and data review.

I'm mainly asking about the footnote since that is what describes our process. If you do have issues please feel free to call me to discuss. However, if you have an alternative sentence or two you could send that by email.

I've also attached the entire document but please note that it is still undergoing revisions (comments in the document are from HQ, which I'm now trying to address).

Cindy